

# EXHIBIT C

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Page 15

CONFIDENTIAL - ATTORNEYS' EYES ON15

1 documents?

2 A. Yes.

3 Q. What documents did you review?

4 A. Social media documents, as well as  
5 documents of communications to and from Uber,  
6 text messages.

7 Q. Were all of the documents that you  
8 reviewed, in preparation for today's  
9 deposition, documents that you had in your  
10 possession?

11 A. Yes, for the text messages and the  
12 social media.

13 Q. The communications with Uber, are  
14 those communications that you were a party to?

15 A. Yes.

16 Q. In preparation for today's  
17 deposition, have you met with anyone other  
18 than your attorneys at those two meetings that  
19 you mentioned?

20 A. Yes.

21 Q. Who else have you met with?

22 MS. CRAIG: Objection. This is  
23 attorney-client privilege and work product  
24 protected material.

25 BY MS. POWER:

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Page 18

CONFIDENTIAL - ATTORNEYS' EYES ON18

1 Q. Were they selected for you by your  
2 attorneys?

3 A. Yes.

4 Q. Did you take any notes during your  
5 preparation for today's deposition?

6 A. No.

7 Q. Other than your attorneys, have you  
8 discussed this deposition with any family or  
9 friends?

10 A. Yes.

11 Q. Who have you discussed it with?

12 A. [REDACTED].

13 Q. Is that [REDACTED]?

14 A. Yes.

15 Q. Anyone else?

16 A. No.

17 Q. And what have you told Ms. [REDACTED]  
18 about today's deposition?

19 A. Just that I would be having today's  
20 deposition and that I would take the full day.

21 Q. At the June meeting in which a  
22 consulting expert was present, did you undergo  
23 a medical examination?

24 A. No.

25 Q. Did you undergo a mental health

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Page 76

CONFIDENTIAL - ATTORNEYS' EYES ON76

1 time you were in the car?

2 A. Not the entire time that I was in the  
3 car.

4 Q. What other apps or uses were on your  
5 phone while you were in the car?

6 A. Google Maps.

7 Q. Why did you have Google Maps open  
8 while you were in the car?

9 A. I opened Google Maps when he entered  
10 the ride while we were still driving.

11 Q. Did you take a phone call while you  
12 were in the car?

13 A. No.

14 Q. Did you speak with [REDACTED]  
15 late the night of August 9th or early morning  
16 August 10th?

17 A. To the best of my recollection, yes.

18 Q. What conversation do you recall  
19 having with [REDACTED] that night?

20 A. I remember calling when I got out of  
21 the car, I believe, because I wanted to be on  
22 the phone with someone because it was late at  
23 night and I was by myself.

24 Q. When you were in the car, you had the  
25 Uber app on. You switched to Google Maps.

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Page 83

CONFIDENTIAL - ATTORNEYS' EYES ON83

1 A. I -- to the best of my recollection,  
2 that's when I called my friend and I waited  
3 for the -- that bus to come. I just kind of  
4 was in shock and numb.

5 Q. When you called [REDACTED], this  
6 would have been sometime after 12:40 a.m.;  
7 correct?

8 A. Yes.

9 Q. Did she pick up?

10 A. I don't think so. To -- yeah, I  
11 don't know. I think I may have left her a  
12 voicemail, but I just wanted to be on my  
13 phone.

14 Q. Were you familiar with the bus route  
15 that ran down Van Ness?

16 A. Yes.

17 Q. How often do you take the bus in San  
18 Francisco?

19 A. Quite frequently. Multiple times a  
20 week.

21 Q. How often would you take the bus home  
22 after being out with your friends at night?

23 A. Very rarely. I would usually take  
24 Uber or Lyft or later a Waymo, because that  
25 felt safer than being on the bus.

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Page 92

CONFIDENTIAL - ATTORNEYS' EYES ON92

1 A. Honestly, I was just kind of in  
2 shock/denial about it. I was trying to just  
3 focus on having fun at the music festival.

4 Q. Besides [REDACTED] and Ms. [REDACTED], did you  
5 tell -- did you -- let me start that question  
6 over again.

7 Besides Ms. [REDACTED], did you tell  
8 anyone else about what happened the 24 hours  
9 after the incident?

10 A. I don't think so, but within  
11 48 hours, I told [REDACTED] and [REDACTED]  
12 [REDACTED].

13 Q. How did you tell them?

14 A. I -- I was at the music festival and  
15 I shared it with her then, and then later  
16 after the festival, we had dinner together  
17 where we talked more about it.

18 Q. And what about [REDACTED]?

19 A. I talked to her on the phone about  
20 what had happened, and then again on multiple  
21 occasions in person.

22 Q. Do you recall telling anyone else  
23 about what happened in the 48 hours after the  
24 incident?

25 A. No.

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Page 136

CONFIDENTIAL - ATTORNEYS' EYES O136

1 MS. POWER: We are on Exhibit 15.

2 There you go. And this is BW-A\_R-S.M.-121.

3 BY MS. POWER:

4 Q. Is this one of the messages that you  
5 were referring to?

6 A. Yes.

7 Q. This is a direct message in  
8 Instagram; correct?

9 A. Yes.

10 Q. It's dated August 19th, 2023;  
11 correct?

12 A. Yes.

13 Q. The user at the top is [REDACTED]  
14 correct?

15 A. Yes.

16 Q. Is that [REDACTED]?

17 A. Yes.

18 Q. The [REDACTED] referenced here is  
19 yourself; correct?

20 A. Yes.

21 Q. Beginning in the second to bottom  
22 message, it looks like it's the most recent at  
23 the top, so the conversation starts at the  
24 bottom.

25 In the second to bottom message,

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Page 137

CONFIDENTIAL - ATTORNEYS' EYES O137

1 it says, [REDACTED] sent a message and then it has  
2 a paragraph of text.

3 Do you see that?

4 A. Yes.

5 Q. The paragraph of text under [REDACTED]  
6 sent a message, that is text posted by a  
7 different account on Uber -- on Instagram;  
8 correct?

9 A. I think so, yeah. It was like a --  
10 an ad basically.

11 Q. Gotcha.

12 And then you responded to [REDACTED]  
13 "Mimi sent me this"; is that right?

14 A. Yes.

15 Q. [REDACTED] is [REDACTED]?

16 A. Correct.

17 Q. You responded "I'm gonna fill it  
18 out"; correct?

19 A. Yep.

20 Q. And [REDACTED] put a heart on your  
21 message?

22 A. Yes.

23 Q. And then you noted that, "It won't  
24 let me click on it though"; is that right?

25 A. Yes. Correct.



CONFIDENTIAL - ATTORNEYS' EYES ONLY

Page 139

CONFIDENTIAL - ATTORNEYS' EYES O139

1 Q. The date of this message is  
2 August 19th, 2023; is that correct?

3 A. Yes.

4 Q. So this is the same day that [REDACTED]  
5 messaged you; right?

6 A. Yes.

7 Q. This is a conversation with [REDACTED]  
8 [REDACTED]

9 A. Yes.

10 Q. She sent you the same exact ad as  
11 [REDACTED]; correct?

12 A. Yes.

13 Q. She wrote "Omg this just popped up  
14 for me. You can probs get some dollar signs";  
15 correct?

16 A. Yes.

17 MS. CRAIG: Object to the form.

18 MS. POWER: What's the objection?

19 MS. CRAIG: You said -- you  
20 misquoted it.

21 MS. POWER: Okay.

22 BY MS. POWER:

23 Q. So [REDACTED], that's [REDACTED]  
24 [REDACTED] writes to you "Omg this just popped  
25 up for me. You can probs get \$\$\$?"; is that

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Page 234

CONFIDENTIAL - ATTORNEYS' EYES O234

1 don't know. When we were planning to schedule  
2 it.

3 Q. If you turn to page 3, it says  
4 "Attachment A" at the top.

5 Do you see that?

6 A. Yes.

7 Q. Have you seen Attachment A  
8 previously?

9 A. Yes.

10 Q. And if you'd turn the page, it has a  
11 list of categories of documents that have been  
12 requested from you.

13 Have you seen that previously?

14 A. Yes.

15 Q. Were you involved in collecting  
16 documents responsive to this document?

17 A. Yes.

18 Q. How did you go about searching for  
19 documents in response to this request?

20 A. I searched my text messages on my  
21 phone. I did a blanket search for Uber  
22 incident and lawsuit. I did the same for  
23 email. I searched for the words "Uber." When  
24 trying to find previous emails, I searched the  
25 Uber email address to search my email.

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Page 235

CONFIDENTIAL - ATTORNEYS' EYES O235

1 I helped change my passwords for  
2 my social media to provide for a firm to gain  
3 access to do like the data search of my social  
4 medias.

5 I reached out to LifeStance to  
6 authorize the collection of my medical and  
7 mental health records by a third party and  
8 signed a release form.

9 Yeah, that, I think -- I'm trying  
10 to think if there's other -- what other  
11 documents there are.

12 To try to find my psychologist in  
13 San Francisco prior to Psychiatric  
14 Alternatives' name. I tried to search by  
15 specialty in the Psychology Today database and  
16 tried to search by the location in San  
17 Francisco that she was based, from what I  
18 remember, yeah. That's pretty much the bulk  
19 of it, I think.

20 Q. Do you have access to like a patient  
21 interface through your health insurance?

22 A. I have access to, like -- I had  
23 access to One Medical's patient's database. I  
24 do now, I think, have access through my health  
25 insurance to something called Included Health.

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Page 240

CONFIDENTIAL - ATTORNEYS' EYES O240

1 -- it was requested of me and when I was doing  
2 that, so that would have been a couple months  
3 ago.

4 Q. Have you had text messages about this  
5 lawsuit or about the incident since you did  
6 that search collection?

7 A. Yes.

8 Q. Who have you texted with since then?

9 A. [REDACTED] [REDACTED] [REDACTED] and [REDACTED]

10 Q. What have you told them about the  
11 lawsuit or the incident since then?

12 A. I let them know that they may be --  
13 somebody may be reaching out to them to talk  
14 to them about me and about what they knew  
15 about the incident. Other than that, I've  
16 just talked to them kind of about the general  
17 timeline of different sort of things that I  
18 have been, like, scheduled to do, so just  
19 events like this, for example, letting them  
20 know that this was going on and that I might  
21 be exhausted or in a difficult mental state  
22 afterwards or might, like, just not be super  
23 responsive via text. That kind of thing.

24 Q. Other than this deposition, what  
25 other events have you highlighted for them?